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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
COUNTY OF KING

KARANBIR SINGH, HARPREET SINGH,  
and NASTEHO OMAR,

Plaintiffs,

v.

IQ DATA INTERNATIONAL, INC., a  
Washington for profit corporation,

Defendant.

NO. 20-2-07084-0 SEA

CLASS ACTION

**DECLARATION OF  
SCOTT M. FENWICK OF KROLL  
SETTLEMENT ADMINISTRATION LLC  
IN CONNECTION WITH FINAL  
APPROVAL OF SETTLEMENT**

1 I, Scott M. Fenwick, declare as follows:

2 **INTRODUCTION**

3 1. I am a Senior Director of Kroll Settlement Administration LLC (“Kroll”),<sup>1</sup> the Class  
4 Administrator appointed in the above-captioned case, whose principal office is located at 2000  
5 Market Street, Suite 2700, Philadelphia, Pennsylvania 19103. I am over 21 years of age and am  
6 authorized to make this declaration on behalf of Kroll and myself. The following statements are  
7 based on my personal knowledge and information provided by other experienced Kroll employees  
8 working under my general supervision. This declaration is being filed in connection with final  
9 approval of the Settlement.

10 2. Kroll has extensive experience in class action matters, having provided services in  
11 class action settlements involving antitrust, securities fraud, labor and employment, consumer, and  
12 government enforcement matters. Kroll has provided notification and/or claims administration  
13 services in more than 3,000 cases.

14 **BACKGROUND**

15 3. Kroll was appointed as the Class Administrator to provide notification and claims  
16 administration services in connection with that certain Amended Settlement Agreement & Release  
17 (the “Settlement Agreement”) entered into in this Action. Kroll’s duties in connection with the  
18 Settlement have and will include: (a) receiving and analyzing the Class Data from Defendant;  
19 (b) creating a Settlement Website with online claim filing capabilities; (c) establishing a toll-free  
20 telephone number; (d) establishing a post office box for the receipt of mail; (e) preparing and  
21 sending the postcard Notice via first-class mail; (f) receiving and processing mail from the United  
22 States Postal Service (“USPS”) with forwarding addresses; (g) receiving and processing  
23 undeliverable mail, without a forwarding address, from the USPS; (h) receiving and processing  
24 claim forms; (i) receiving and processing opt outs; and (j) such other tasks as counsel for the Parties  
25 or the Court request Kroll to perform.

26  
27  
28 <sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Settlement Agreement (as defined below).

1 **NOTICE PROGRAM**

2 **Data and Case Setup**

3 4. On November 7, 2023, Kroll established a toll-free telephone number, (833) 383-  
4 5665, for Class Members to call and obtain additional information regarding the Settlement through  
5 an interactive voice response (“IVR”) system. As of February 16, 2024, the IVR system has  
6 received 213 calls.

7 5. Also on November 7, 2023, Kroll designated a post office box with the mailing  
8 address *Singh et al. v. IQ Data International*, c/o Kroll Settlement Administration LLC, PO Box  
9 5324, New York, NY 10150-5324, in order to receive claim forms, opt outs, and all other  
10 correspondence from Class Members.

11 6. On November 10, 2023, Kroll created a dedicated Settlement Website entitled  
12 [www.tenantinterestsettlement.com](http://www.tenantinterestsettlement.com). The Settlement Website “went live” on December 6, 2023, and  
13 contains information about the Settlement, answers to frequently asked questions, contact  
14 information for the Class Administrator, important dates and deadlines, and documents relating to  
15 the Settlement, including the Settlement Agreement, the Preliminary Approval Order, the class  
16 certification order, a printable opt-out form, a printable claim form for the FDCPA Class, and  
17 Plaintiffs’ motion for attorneys’ fees, costs and service awards. The Settlement Website provided  
18 the FDCPA Class the opportunity to file a claim form online, and provided the CPA Class the  
19 opportunity to select an electronic payment. As of February 16, 2024, Kroll has received seventy-  
20 three (73) messages from Class Members through the “Contact” section of the Settlement Website.

21 7. On November 16, 2023, Kroll received two (2) Class Data files from the Defendant.  
22 The first file contained information on 65,198 Class Members in the FDCPA Class which included  
23 seven (7) field descriptions, while the second file contained information on 30,858 Class Members  
24 in the CPA Class which included nine (9) field descriptions. Kroll undertook several steps to  
25 reconcile the files by de-duping and cleaning the data in order to compile the eventual Class Data  
26 of 50,152 members of the FDCPA Class and 30,835 members of the CPA Class. Additionally, in  
27 an effort to ensure that postcard Notices would be deliverable to Class Members, Kroll ran the Class  
28

1 Data through the USPS’s National Change of Address (“NCOA”) database and updated  
2 accordingly.

3 **The Notice Program**

4 8. There are two (2) Notice groups in this matter – the FDCPA Class and the CPA  
5 Class. On December 6, 2023, Kroll caused 80,987 postcard Notices to be mailed via first-class  
6 mail. Of these 80,987 postcard Notices, 50,152 were mailed to the FDCPA Class and 30,835 were  
7 mailed to the CPA Class. The FDCPA Class postcard Notice included a tear-off claim form for the  
8 Class Member to sign and return, while the CPA Class postcard Notice indicated that a signed claim  
9 form was not required in order to participate in the Settlement. The FDCPA and CPA postcard  
10 Notices are attached hereto as **Exhibits A and B**, respectively.

11 **NOTICE PROGRAM REACH**

12 9. As of February 16, 2024, 447 Postcard Notices were returned by the USPS with a  
13 forwarding address. Of those, 435 Notices were automatically re-mailed to the updated addresses  
14 provided by the USPS. The remaining 12 postcard Notices were re-mailed by Kroll to the updated  
15 address provided by the USPS.

16 10. As of February 16, 2024, 19,368 Notices were returned by the USPS as  
17 undeliverable as addressed, without a forwarding address. Kroll ran 18,923 undeliverable records  
18 through an advanced address search.<sup>2</sup> The advanced address search produced 14,785 updated  
19 addresses. Kroll has re-mailed Notices to the 14,785 updated addresses obtained from the advanced  
20 address search. Of the 14,785 re-mailed Notices, 2,338 have been returned as undeliverable a  
21 second time.

22 **CLAIM ACTIVITY**

23 11. As of February 16, 2024, Kroll has received 1,615 FDCPA claim forms through the  
24 mail and 1,366 FDCPA claim forms filed electronically through the Settlement Website. Kroll has  
25

26 \_\_\_\_\_  
27 <sup>2</sup> The remaining 445 undeliverable Notices received to date were received after the advanced  
28 address search was run and therefore those records were not included in the search.

1 also received 171 CPA Class electronic payment selections through the Settlement Website. Kroll  
2 is still in the process of reviewing and validating claim forms.

3 12. To prevent claim forms from being filed by individuals outside the FDCPA Class  
4 and to curtail fraud, Class Members were provided a unique “Class Member ID” on their respective  
5 postcard Notices. The Class Member ID is required for FDCPA Class Members to file a claim form  
6 online or for CPA Class Members to select electronic payment online.

7 13. The Claims Deadlines was February 5, 2024. As of February 16, 2024, Kroll has  
8 received no late claim forms.

9 **EXCLUSIONS AND OBJECTIONS**

10 14. The Opt-Out and Objection Deadlines were February 5, 2024.

11 15. Kroll has received ten (10) timely exclusion requests to the Settlement. A list of the  
12 exclusion requests received is attached hereto as **Exhibit C**. Class Members were not instructed to  
13 submit their objection to the Class Administrator, and none have been received by Kroll.

14 **CERTIFICATION**

15 I declare under penalty of perjury under the laws of the State of Washington that the above  
16 is true and correct to the best of my knowledge and that this declaration was executed on February  
17 16, 2024, in Inver Grove Heights, Minnesota.

18  
19   
20 SCOTT M. FENWICK

# Exhibit A

**COURT AUTHORIZED LEGAL NOTICE**  
**THIS IS NOT A COLLECTION NOTICE**

If you are a Washington resident and a former tenant of a rental property in Washington State on whose account IQ Data International, Inc., collected or attempted to collect a debt, you may be entitled to benefits from a class action settlement in a case titled *Karanbir Singh et al. v. IQ Data International, Inc.*, Superior Court of the State of Washington, County of King, Case No. 20-2-07084-0 SEA

- The Plaintiffs allege that IQ Data violated the federal Fair Debt Collection Practices Act, Washington Collection Agency Act, and Washington Consumer Protection Act by assessing interest on certain alleged debts.
- IQ Data denies it did anything wrong. The Court has not decided who is right.
- To resolve this lawsuit IQ Data has agreed to pay \$4 million into a Settlement Fund, which will be used to pay awards to Class Members, service awards to the Class Representatives (up to \$30,000), attorneys' fees and costs (up to \$1,047,057), and settlement administration costs (up to \$143,000).

**Singh et al. v. IQ Data International**  
c/o Kroll Settlement Administration LLC  
PO Box 5324  
New York, NY 10150-5324

**Electronic Service Requested**

<<Refnum Barcode>>

CLASS MEMBER ID: <<Refnum>>

**Postal Service: Please do not mark barcode**

<<FirstName>> <<LastName>>

<<Company>>

<<Address1>>

<<Address2>>

<<City>>, <<State>> <<Zip>>

<<Country>>

## **WHO IS A CLASS MEMBER?**

You may be in the **FDCPA** Class if you are a Washington resident and a former tenant of a residential property in Washington and IQ Data, on or after January 5, 2020, through the date of the Preliminary Approval Order, collected or attempted to collect interest calculated from your move out date. IQ Data's records indicate that you are a member of the FDCPA Class. The Settlement Fund will be allocated so that \$225,000 goes to the FDCPA Class members who file a valid claim and the balance goes to the CPA Class. You can learn more at **[www.tenantinterestsettlement.com](http://www.tenantinterestsettlement.com)**.

**SETTLEMENT AWARD AMOUNTS:** You must submit a claim to get a Settlement Award as a member of the FDCPA Class. The \$225,000 allocated to the FDCPA Class will be divided equally among all members of the FDCPA Class who submit claims. If you submit a claim, your estimated award amount is \$35. This is an estimate; your final award amount could be different.

## **YOUR RIGHTS AND OPTIONS**

**Make a Claim for a Settlement Award.** To receive a payment from this Settlement, you must submit a claim online or by mail by February 5, 2024. The claim form is available at [www.tenantinterestsettlement.com](http://www.tenantinterestsettlement.com) and is attached to this postcard. To mail your claim, simply read the form, check that your name and address are correct, then sign, and detach the form attached to this Notice and mail it back by February 5, 2024. This is the only option that allows you to get a payment.

**Do Nothing. Stay in this lawsuit. Get no Settlement benefits. Give up certain rights.**

By doing nothing, you will not get a payment and you give up any rights to sue IQ Data separately about the same or similar legal claims.

**Ask to be Excluded by February 5, 2024. Opt out of this lawsuit. Get no benefits from it. Keep rights.**

If you exclude yourself, you will not be eligible to receive any money or benefits that come from the Settlement and you may not object. This is the only option that allows you to be part of any other lawsuit against IQ Data about collection of prejudgment interest. Your exclusion request must be made in writing and include your name, address, telephone number and the case name "Singh et al. v. IQ Data International, Inc." Exclusion request letters must be postmarked by February 5, 2024. For more information about opting out of the lawsuit, visit the Settlement Website at **[www.tenantinterestsettlement.com](http://www.tenantinterestsettlement.com)**.

**Object to the Settlement by February 5, 2024. Stay in this lawsuit. File with the Court a written objection to the Settlement.**

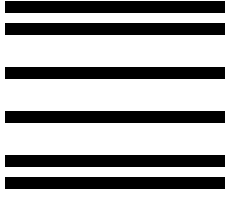
If you disagree with any part of the Settlement Agreement, you may file with the Court a written objection, which will be considered at the Final Approval Hearing. If you file an objection, you may not exclude yourself from the Settlement. If the Settlement is approved, you will be bound by the Settlement Agreement and you give up rights to sue IQ Data separately about the same or similar legal claims in this lawsuit, but you will still be eligible to receive money and benefits that come from the Settlement. For instructions on how to file an objection, visit the Settlement Website at **[www.tenantinterestsettlement.com](http://www.tenantinterestsettlement.com)**.

**Attend the Final Approval Hearing. The hearing is scheduled for March 1, 2024, at 8:30 AM Pacific Time. Any changes will be posted on the Settlement Website.** If you do not exclude yourself, you may file a request to speak at the Final Approval Hearing. **YOU ARE NOT REQUIRED TO ATTEND THE HEARING TO RECEIVE BENEFITS FROM THE SETTLEMENT.** For instructions on how to file a request to speak at the hearing, visit the Settlement Website at **[www.tenantinterestsettlement.com](http://www.tenantinterestsettlement.com)**.

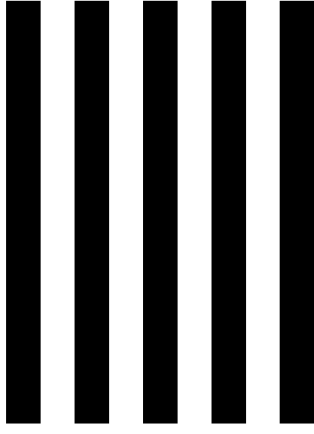
**Do I have a lawyer?** The Court decided that the law firms Terrell Marshall Law Group, PLLC and Leonard Law, PLLC are qualified to represent you and all Class Members. If you do nothing and stay in the lawsuit, those lawyers will represent the interests of you and the Classes regarding the legal claims raised in this lawsuit; however, they do not represent you regarding the underlying debt that was assigned to IQ Data. If you have questions about whether you need your own lawyer, visit the Settlement Website at **[www.tenantinterestsettlement.com](http://www.tenantinterestsettlement.com)**.

**This Notice is only a summary. Details about the Settlement can be found on the website: [www.tenantinterestsettlement.com](http://www.tenantinterestsettlement.com).**





NO POSTAGE  
NECESSARY  
IF MAILED  
IN THE  
UNITED STATES



**BUSINESS REPLY MAIL**  
FIRST-CLASS MAIL PERMIT NO. 36777526 NEW YORK, NY

POSTAGE WILL BE PAID BY ADDRESSEE

SINGH V. IQ DATA INTERNATIONAL  
C/O KROLL SETTLEMENT ADMINISTRATION  
PO BOX 5324  
NEW YORK NY 10126-2876



Carefully separate at perforation

<<refnum barcode>>

Class Member ID: <<refnum>>

**Singh et al. v. IQ Data International**  
**CLAIM FORM**

Class Member ID: <<refnum>>

<<firstname>> <<mi>> <<lastname>>

<<address1>> <<address2>>

<<City>>, <<State>> <<Zip>>

If different than the preprinted data on the left, please print your correct information:

First Name	MI	Last Name
Address		
City	State	ZipCode

To Receive Compensation from the Settlement, You Must Enter All Requested Information, and Sign and Mail this Claim Form, Postmarked On or Before February 5, 2024.

If you prefer to receive your payment electronically, please submit your claim online at [www.tenantinterestsettlement.com](http://www.tenantinterestsettlement.com).

**ATTESTATION:** By submitting this claim form, the undersigned agrees that he or she will be entitled to relief specified in the Settlement Agreement and will be bound by the Release in the Settlement Agreement.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

# Exhibit B

**COURT AUTHORIZED LEGAL NOTICE**  
**THIS IS NOT A COLLECTION NOTICE**

If you are a Washington resident and a former tenant of a rental property in Washington State on whose account IQ Data International, Inc., collected or attempted to collect a debt, you may be entitled to benefits from a class action settlement in a case titled *Karanbir Singh et al. v. IQ Data International, Inc.*, Superior Court of the State of Washington, County of King, Case No. 20-2-07084-0 SEA

- The Plaintiffs allege that IQ Data violated the federal Fair Debt Collection Practices Act, Washington Collection Agency Act, and Washington Consumer Protection Act by assessing interest on certain alleged debts.
- IQ Data denies it did anything wrong. The Court has not decided who is right.
- To resolve this lawsuit IQ Data has agreed to pay \$4 million into a Settlement Fund, which will be used to pay awards to Class Members, service awards to the Class Representatives (up to \$30,000), attorneys' fees and costs (up to \$1,047,057), and settlement administration costs (up to \$143,000).

**Singh et al. v. IQ Data International**  
c/o Kroll Settlement Administration LLC  
PO Box 5324  
New York, NY 10150-5324

**Electronic Service Requested**

<<Refnum Barcode>>

CLASS MEMBER ID: <<Refnum>>

**Postal Service: Please do not mark barcode**

<<FirstName>> <<LastName>>

<<Company>>

<<Address1>>

<<Address2>>

<<City>>, <<State>> <<Zip>>

<<Country>>

## **WHO IS A CLASS MEMBER?**

You may be in the **CPA Class** if you are a Washington resident and a former tenant of a residential property in Washington and IQ Data, on or after January 5, 2017, through the date of the Preliminary Approval Order, collected interest calculated from your move out date. IQ Data's records indicate that you are a member of the CPA Class. The Settlement Fund of \$4,000,000 will be allocated so that \$225,000 goes to the FDCPA Class and the remaining balance to the CPA Class, less any attorneys' fees, service awards, and administration fees. You can learn more at **[www.tenantinterestsettlement.com](http://www.tenantinterestsettlement.com)**.

**SETTLEMENT AWARD AMOUNTS:** Your share of the Settlement will be approximately, 61% of the amount you paid in interest to IQ Data. If you lived with other adults, the Settlement Award amount for your account will be split evenly among all of the Washington residents on the account. If you would like to receive your payment electronically instead of by check, please visit the Settlement Website at **[www.tenantinterestsettlement.com](http://www.tenantinterestsettlement.com)**.

## **YOUR RIGHTS AND OPTIONS**

**Do Nothing.** Stay in this lawsuit. Be eligible for Settlement benefits. Give up certain rights.

By doing nothing, you keep the possibility of getting money or benefits that come from the Settlement, but you give up any rights to sue IQ Data separately about the same or similar legal claims. You do not have to file a claim to get a payment.

The Court decided that the law firms Terrell Marshall Law Group, PLLC and Leonard Law, PLLC are qualified to represent you and all Class Members. If you do nothing and stay in the lawsuit, those lawyers will represent the interests of you and the Classes regarding the legal claims raised in this lawsuit; however, they do not represent you regarding the underlying debt that was assigned to IQ Data. If you have questions about whether you need your own lawyer, visit the Settlement Website at **[www.tenantinterestsettlement.com](http://www.tenantinterestsettlement.com)**.

**Ask to be Excluded by February 5, 2024.** Opt out of this lawsuit. Get no benefits from it. Keep rights.

If you exclude yourself, you will not be eligible to receive any money or benefits that come from the Settlement and you may not object. This is the only option that allows you to be part of any other lawsuit against IQ Data about collection of prejudgment interest. Your exclusion request must be made in writing and include your name, address, telephone number and the case name "Singh et al. v. IQ Data International, Inc." Exclusion request letters must be postmarked by February 5, 2024. For more information about opting out of the lawsuit, visit the Settlement Website at **[www.tenantinterestsettlement.com](http://www.tenantinterestsettlement.com)**.

**Object to the Settlement by February 5, 2024.** Stay in this lawsuit. File with the Court a written objection to the Settlement.

If you disagree with any part of the Settlement Agreement, you may file with the Court a written objection, which will be considered at the Final Approval Hearing. If you file an objection, you may not exclude yourself from the Settlement. If the Settlement is approved, you will be bound by the Settlement Agreement and you give up rights to sue IQ Data separately about the same or similar legal claims in this lawsuit, but you will still be eligible to receive money and benefits that come from the Settlement. For instructions on how to file an objection, visit the Settlement Website at **[www.tenantinterestsettlement.com](http://www.tenantinterestsettlement.com)**.

**Attend the Final Approval Hearing.** The hearing is scheduled for **March 1, 2024, at 8:30 AM Pacific Time. Any changes will be posted on the Settlement Website.**

If you do not exclude yourself, you may file a request to speak at the Final Approval Hearing. YOU ARE NOT REQUIRED TO ATTEND THE HEARING TO RECEIVE BENEFITS FROM THE SETTLEMENT. For instructions on how to file a request to speak at the hearing, visit the Settlement Website at **[www.tenantinterestsettlement.com](http://www.tenantinterestsettlement.com)**.

**This Notice is only a summary. Details about the Settlement can be found on the website: [www.tenantinterestsettlement.com](http://www.tenantinterestsettlement.com). Please do not contact the Court.**

# Exhibit C

### EXCLUSION LIST

<b>Count</b>	<b>Record Identification Number</b>	<b>First</b>	<b>Last</b>	<b>Class</b>
1	796557ZST0ZKR	B.	Rebeschini	FDCPA
2	796557ZSRYP0Z	L.	Glass	FDCPA
3	796558FQVYKD2	C.	Mickelson	FDCPA
4	79655832Q2PW3	C.	Anderson	FDCPA
5	7965588ZWCKR	B.	Loper	FDCPA
6	796558NMDV5SY	R.	Onwukwe	FDCPA
7	7965580RF5SNZ	N.	Carby	FDCPA
8	79655870HYFXQ	E.	Kuster	FDCPA
9	79655870H35FM	E.	Kuster II	FDCPA
10	796557DRHMRHX	D.	Biggs	FDCPA
11	796558B7N8BG8	T.	Carnahan	FDCPA
12	796558FX3KK6H	E.	Garnica	FDCPA
13	796558FX2J4WY	D.	Garnica	FDCPA